

1 JOHN M. SORICH (CA Bar No. 125223)
john.sorich@piblaw.com
2 RAFAEL GARCIA-SALGADO (CA Bar No. 283230)
rafael.garcia@piblaw.com
3 PARKER IBRAHIM & BERG LLC
695 Town Center Drive, 16th Floor
4 Costa Mesa, California 92626
Tel: (714) 361-9550
5 Fax: (714) 784-4190

6 Attorneys for Defendant
JPMORGAN CHASE BANK, N.A.
7

8 **UNITED STATES DISTRICT COURT**
9 **NORTHERN DISTRICT OF CALIFORNIA - OAKLAND**
10

11
12 ALI RANKANKAN,

13 Plaintiff,

14 v.
15

16 J.P.MORGAN CHASE BANK, N.A.,
successor in interest to WASHINGTON
17 MUTUAL BANK, F.A.; U.S. BANK,
N.A., successor in interest to
18 GREENPOINT MORTGAGE
FUNDING, INC.; MTC FINANCIAL
19 INC., a California Corporation doing
business as TRUSTEE CORPS; ALL
20 PERSONS UNKNOWN, CLAIMING
21 ANY LEGAL OR EQUITABLE RIGHT,
TITLE, ESTATE, LIEN, OR INTEREST
22 IN THE PROPERTY DESCRIBED IN
THE COMPLAINT ADVERSE TO
23 PLAINTIFF'S TITLE, OR ANY CLOUD
ON PLAINTIFF'S TITLE THERETO,
24 and DOES 1 through 20, inclusive,

25 Defendants.
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27
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CASE NO.: 4:16-cv-1694-JCS_____

JUDGE: Joseph C. Spero

**JOINT STIPULATION TO EXTEND
DATE TO FILE RESPONSIVE
PLEADING TO PLAINTIFF'S
COMPLAINT**

ACTION FILED: March 4, 2016

REMOVED: April 4, 2016

This stipulation (“Stipulation”) is entered into by the undersigned counsel for defendant JPMorgan Chase Bank, N.A., (“Chase” or “Defendant”), and the undersigned counsel for plaintiff Ali Rankankan (“Plaintiff”) (together with Defendant, the “Parties”).

RECITALS

WHEREAS, on March 4, 2016, Plaintiff filed a Complaint in Contra Costa Superior Court in the case entitled *Rankankan v JPMorgan Chase Bank, N.A., et al*, Case No. C16-00405.

WHEREAS, on April 4, 2016, Defendant filed a Notice of Removal with this Court.

WHEREAS, April 11, 2016 is currently Defendant's last date to file a responsive pleading to Plaintiff's Complaint.

WHEREAS Plaintiff has agreed to extend Defendant's deadline for filing a responsive pleading.

AGREEMENT

FOR ADEQUATE CONSIDERATION, THE SUFFICIENCY OF WHICH IS
ACKNOWLEDGED, AND FOR GOOD CAUSE, THE PARTIES STIPULATE AS
FOLLOWS:

[SIGNATURES ON FOLLOWING PAGE]

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1 1. The Parties agree that Defendant's deadline to file a responsive pleading
2 shall be extended through and including April 20, 2016.

3 **IT IS SO STIPULATED.**

4
5 DATED: April 11, 2016

PARKER IBRAHIM & BERG LLC

6
7 By: /s/Rafael R. Garcia-Salgado
8 JOHN SORICH
9 RAFAEL R. GARCIA-SALGADO
Attorneys for JPMorgan Bank, N.A.

10 DATED: April 11, 2016

LAW OFFICES OF THOMAS Eastridge

11
12 By: /s/Thomas Eastridge
13 THOMAS Eastridge
Attorneys for Plaintiff
14 ALI RANKANKAN

15 *[E-Signature authorized on April 11, 2016]*

16 The Filing Attorney attests that all other
17 Signatories listed, and on whose behalf
the filing is submitted, concur in the filing's
content and have authorized the filing.
18 See N.D. Cal. Civ. L.R. 5-1(i)(3).

19
20 Dated: April 18, 2016



PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF ORANGE

Ali Rankankan v. JPMorgan Chase Bank, N.A.

USDC Northern District (Oakland) Case No.: 4:16-cv-01694

I am employed in the County of Orange, State of California. I am over the age of 18 years and not a party to the within action. My business address is **Parker Ibrahim & Berg LLC, 695 Town Center Drive, 16th Floor, Costa Mesa, California 92626.**

On April 11, 2016, I served the foregoing document described as **JOINT STIPULATION TO EXTEND DATE TO FILE RESPONSIVE PLEADING TO PLAINTIFF'S COMPLAINT** on the interested parties in this action.

☒ by placing the original and/or a true copy thereof enclosed in (a) sealed envelope(s), addressed as follows:

SEE ATTACHED SERVICE LIST

☐ **BY REGULAR MAIL:** I deposited such envelope in the mail at 695 Town Center Drive, 16th Floor, Costa Mesa, California 92626. The envelope was mailed with postage thereon fully prepaid.

I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. It is deposited with the U.S. Postal Service on that same day in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one (1) day after date of deposit for mailing in affidavit.

BY THE ACT OF FILING OR SERVICE, THAT THE DOCUMENT WAS PRODUCED ON PAPER PURCHASED AS RECYCLED.

☐ **BY FACSIMILE MACHINE:** I Tele-Faxed a copy of the original document to the above facsimile numbers.

☒ **BY OVERNIGHT MAIL:** I deposited such documents at the Golden State Overnight or Federal Express Drop Box located at 695 Town Center Drive, 16th Floor, Costa Mesa, California 92626. The envelope was deposited with delivery fees thereon fully prepaid.

☒ **BY CM/ECF ELECTRONIC DELIVERY:** In accordance with the registered case participants and in accordance with the procedures set forth at the Court's website www.ecf.cacd.uscourts.gov

☒ (Federal) I declare that I am employed in the office of a member of the Bar of this Court, at whose direction the service was made.

Executed on April 11, 2016, at Costa Mesa, California.

/s/ Katherine Edwards

Katherine Edwards

SERVICE LIST

Ali Rankankan v. JPMorgan Chase Bank, N.A.
USDC Northern District (Oakland) Case No.: 4:16-cv-01694

Thomas Eastridge, Esq/
Law Offices of Thomas Eastridge
1425 Leimert Blvd., Suite 400
Oakland, CA 94602

T 510.530.1700
F 510.530.8067

Attorney for Plaintiff
Ali Rankankan

Richard J. Reynolds, Esq.
Burk, Williams & Sorensen, LLP
1851 East First St., Suite 1550
Santa Ana, CA 92705-4067

Attorneys for Defendant
MTC Financial dba Trustee Corps

Tanya C. McCullah, Esq.
Zieve, Brodnax & Steele, LLP
30 Corporate Park, Suite 450
Irvine, CA 92606

Attorneys for Defendant
U.S. Bank

VIA OVERNIGHT

Chief Magistrate Judge Joseph C. Spero
San Francisco Courthouse, Courtroom G – 15th Flr
450 Golden Gate Avenue
San Francisco, CA 94102